From: Fogarty, Johnpc [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=8546B387C687410D88EEEE387DADDF56-JF0GAR02]

**Sent**: 10/26/2016 5:52:03 PM

To: Welles, Laura [Welles.Laura@epa.gov]

Subject: RE: WF audit - round 2

Thanks for these - see below

-----Original Message-----From: Welles, Laura

Sent: Wednesday, October 26, 2016 1:03 PM To: Fogarty, Johnpc <Fogarty.Johnpc@epa.gov>

Subject: RE: WF audit - round 2

Are you planning to put the notice to regional stores re: unannounced audit visit to store concept (similar to Connecticut

case) into the draft audit?

Ex. 5 AC/AWP/DP

Ex. 5 AC/AWP/DP

----Original Message-----

From: Welles, Laura

Sent: Tuesday, October 25, 2016 6:22 PM To: Fogarty, Johnpc <Fogarty.Johnpc@epa.gov>

Subject: RE: WF audit - round 2

## Ex. 5 AC/AWP/DP

- 3. I haven't crunched the numbers yet, but I will start tomorrow. I did reach out to Region 1 about a recent case they settled where they calculated EB for failure to make HW determination (I forward it to you). I was curious how they went about doing the EB and what numbers they got, etc. Anyone in WCED who might know what the cost to do a HW determination might be on a per store basis?
- 4. I've been looking into SEP ideas. Here are some possible options (some of these may sound familiar):

## Ex. 5 AC/AWP/DP

## Ex. 5 AC/AWP/DP

----Original Message----From: Fogarty, Johnpc

Sent: Tuesday, October 25, 2016 12:51 PM To: Welles, Laura < Welles. Laura@epa.gov>

Subject: RE: WF audit - round 2

Finally getting to this. Thanks for the comments - they're helpful.

Two followups:

Ex. 5 AC/AWP/DP

Ex. 5 AC/AWP/DP

## Ex. 5 AC/AWP/DP

Also, have you had a chance to try and crunch any numbers under the RCRA penalty policy?

----Original Message----From: Welles, Laura

Sent: Tuesday, October 11, 2016 1:24 PM To: Fogarty, Johnpc < Fogarty. Johnpc@epa.gov>

Subject: RE: WF audit - round 2

The narrative approach is definitely easier to understand. I also think the flow chart provides a good visual to help understand the process.

I just had a few suggested edits and comments.

What are your thoughts re: Ex. 5 AC/AWP/DP

Laura

----Original Message----From: Fogarty, Johnpc

Sent: Friday, October 07, 2016 2:24 PM

To: Welles, Laura < Welles. Laura@epa.gov>

Subject: WF audit - round 2

Based on your comments and re-reading this, I started to think that, at least at this level, I perhaps needed to go with more of a narrative approach and to do something to make it simpler to follow the process. See what you think of this version. I also ginned up a process flow chart, which hopefully makes it easier to grasp.

Hope you enjoyed the long weekend!